Message

From: Scott Huelsman [huelsmantrucking@gmail.com]

Sent: 10/25/2017 8:14:44 PM

To: Healy, Stephen [/o=ExchangeLabs/ou=Exchange Administrative Group

(FYDIBOHF23SPDLT)/cn=Recipients/cn=d1638b0a30364c7d98ea7af410a9cb2a-Healy, Stephen]

Subject: Re: Request for Small Business Exemption as a Gilder Assembler

Stephen,

I'm not sure I understand your response. Can we still qualify or are you saying we don't qualify? If we must purchase the trucks and sell them from now on, that's what we will do.

Scott

On Wed, Oct 25, 2017 at 4:07 PM, Healy, Stephen < healy.stephen@epa.gov > wrote:

Scott.

If you are not purchasing the glider kit and only supplying assembly service then you have no further requirement at this time.

Thanks

Stephen Healy

Mechanical Engineer

EPA OTAQ Compliance Division

Diesel Engine Compliance Center

734--214-4121

From: Scott Huelsman [mailto:huelsmantrucking@gmail.com]

Sent: Wednesday, October 25, 2017 4:04 PM

To: Healy, Stephen < healy.stephen@epa.gov >

Subject: Re: Request for Small Business Exemption as a Gilder Assembler

Stephen,

Yes that is correct. We would prefer to continue letting our customers purchase the truck and us doing the assembly work if that is possible. If that is not possible then we will purchase the truck and build them and sell them to our customers.

Scott

On Wed, Oct 25, 2017 at 3:37 PM, Healy, Stephen healy.stephen@epa.gov wrote:

Scott,

In 2010 through 2014 all the gliders you assembled were purchased by your customer and you provided the assembly service. Is this correct? Are you intending to purchase gliders then build them and sell the finished truck?

Thanks

Stephen Healy

Mechanical Engineer

EPA OTAQ Compliance Division

Diesel Engine Compliance Center

734--214-4121

From: Scott Huelsman [mailto: huelsmantrucking@gmail.com]

Sent: Wednesday, October 25, 2017 3:31 PM **To:** Healy, Stephen healy.stephen@epa.gov>

Subject: Re: Request for Small Business Exemption as a Gilder Assembler

Stephen,

We have not sold any gliders. We are a public trucking service garage and all the gliders that we have assembled in the past our customers have bought from a dealer and had delivered to us and we have done all the work tearing apart the donor trucks and assembling the glider. So are you telling me that we don't qualify and can no longer build gliders? Our Kenworth salesman is telling us that we need this exemption to get our assembler number for the upcoming year. We got an assembler number last year but he says we need to get a new one every year.

Let me know,

Scott

On Wed, Oct 25, 2017 at 10:58 AM, Healy, Stephen healy.stephen@epa.gov> wrote:

Scott,

Have you sold any of the gliders that you have built? The letter that you sent indicates that you have not sold any gliders. To qualify for the small business exemption the regulations require that you've sold at least one glider. The regulation is 40 CFR 1037.150(t)(i). Here is the excerpt below:

§1037.150 Interim provisions.

(t)(i) You are eligible for this exemption if you are a small manufacturer and you sold one or more glider vehicles in 2014 under the provisions of §1037.150(c). You do not qualify if you only produced glider vehicles for your own use. You must notify us of your plans to use this exemption before you introduce exempt vehicles into U.S. commerce. In your notification, you must identify your annual U.S.-directed production volume (and sales, if different) of such vehicles for calendar years 2010 through 2014. Vehicles you produce before notifying us are not exempt under this section.

Thank you,

Stephen Healy

Mechanical Engineer

EPA OTAQ Compliance Division

Diesel Engine Compliance Center

734--214-4121

From: Scott Huelsman [mailto: huelsmantrucking@gmail.com]

Sent: Wednesday, October 25, 2017 10:19 AM **To:** Healy, Stephen healy.stephen@epa.gov>

Subject: Request for Small Business Exemption as a Gilder Assembler

Hello Stephen,

Attached is the form for the Request for Small Business Exemption as a Glider Assmebler. Please let me know if we need to make any changes.

Thanks

Scott Huelsman

Huelsman Trucking

8037 Marion Drive

Maria Stein, OH 45860

Phone 419-925-4230